# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Beckham Jewelry, LLC, Debtor

Case No. 25-01234

CHAPTER 11

#### **NOTICE**

Debtor has filed amended papers with the court to be Employ Counsel.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the Motion, or if you want the court to consider your views on the Motion, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk U.S. Bankruptcy Court Thad Cochran United States Courthouse 501 E. Court St., Ste 2.300 Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to Debtor's attorney:

The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 (601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Application.

Date: May 23, 2025 Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469) Jennifer A Curry Calvillo (MSBN 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767 Jackson, MS 39236 601-500-5533

trollins@therollinsfirm.com

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Beckham Jewelry, LLC, Debtor

Case No. 25-01234

CHAPTER 11

#### AMENDED APPLICATION OF DEBTOR IN POSSESSION TO EMPLOY COUNSEL

COMES NOW, Beckham Jewelry, LLC (the "Debtor"), by and through the undersigned counsel, pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014, and hereby respectfully moves this Court to approve the employment of The Rollins Law Firm, PLLC as attorney for the Debtor in Possession. In support of this application, the Debtor states as follows:

- On May 14, 2025, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Mississippi.
- 2. The Debtor wishes to employ The Rollins Law Firm, PLLC as its attorney in this Chapter 11 case.
- 3. The professional services to be rendered by The Rollins Law Firm, PLLC include, but are not limited to, advising the Debtor on all matters which are now anticipated to arise in the functioning of this proceeding.
- 4. The Rollins Law Firm, PLLC is competent to represent the Debtor in all matters which are now anticipated to arise in the functioning of this proceeding.
- 5. To the best of the Debtor's knowledge, The Rollins Law Firm, PLLC has no adverse interest to the Debtor or the estate and has no connection with the creditors or other parties in interest or their respective attorneys.
- 6. The proposed terms of employment for The Rollins Law Firm, PLLC are as follows:
  - a. Thomas Rollins' hourly rate is \$400 per hour;

- b. Jennifer Calvillo's hourly rate is \$360 per hour.
- c. Paralegals will bill at \$155 per hour;
- d. Legal assistants will bill at \$100 per hour;
- 7. Any retainer received will be applied against the fees and expenses incurred before any additional fees will be sought.
- 8. The Bankruptcy Code allows for the employment of professionals, including attorneys, on reasonable terms and conditions, subject to court approval. 11 U.S.C. § 327(a)
- 9. The proposed terms of employment, including the hourly rates, are reasonable and in line with prevailing market rates for attorneys with similar experience and expertise in bankruptcy matters.
- 10. The employment of The Rollins Law Firm, PLLC is necessary and in the best interests of the Debtor and the estate to ensure proper representation throughout the Chapter 11 proceedings.

WHEREFORE, the Debtor respectfully requests that this Court enter an order:

- A. Authorizing the employment of The Rollins Law Firm, PLLC as attorney for the Debtor in Possession;
- B. Approving the terms of employment as set forth in this application; and
- C. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

Beckham Jewelry, LLC, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr. Its Attorney Thomas C. Rollins, Jr. (MSBN 103469) The Rollins Law Firm, PLLC P.O. Box 13767 Jackson, MS 39236 601-500-5533 trollins@therollinsfirm.com

## **CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on May 23, 2025, to:

By Electronic CM/ECF Notice:

U.S. Trustee

/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr.

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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI

IN RE: Beckham Jewelry, LLC, Debtor

Case No. 25-01234 CHAPTER 11

### **AFFIDAVIT OF ATTORNEY**

STATE OF MISSISSIPPI COUNTY OF HINDS

- I, Thomas C. Rollins, Jr., being duly sworn, hereby depose and say:
- I am an attorney duly admitted to practice law in the State of Mississippi and before the United States District Court for the Southern District of Mississippi. I am a partner of The Rollins Law Firm, PLLC (the "Firm"), which maintains its principal office at 40 Northtown Drive, Jackson MS 39211.
- 2. This Affidavit is submitted pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014(a) in support of the application of Beckham Jewelry, LLC (the "Debtor") for an order approving the employment of myself and the Firm as attorneys for the Debtor in Possession in the above-captioned Chapter 11 case (the "Case"). This Case was filed on May 14, 2025, in the United States Bankruptcy Court for the Southern District of Mississippi (the "Court").
- 3. To the best of my knowledge, I do not represent any interest adverse to the Debtor or its estate in the matters upon which I an to be engaged. I am a "disinterested person" as that term is defined in 11 U.S.C. § 101(14). The Firm, its partners, of counsel, and associates:
  - a. are not creditors, equity security holders, or insiders of the Debtor;
  - are not and were not, within two years before the Petition Date, directors,
     officers, or employees of the Debtor; and

- c. do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.
- d. The U.S. Trustee has raised a potential conflict concerning the Jewelry Retainer paid to The Rollins Law Firm, PLLC, based on the discovery of a UCC financing statement asserting a blanket lien on the Debtor's property. The retainer was received in the ordinary course of business, and the validity of the alleged lien is questionable. The retainer has not been drawn upon and remains securely held in trust. The Rollins Law Firm is prepared to return the Jewelry upon entry of an appropriate Order by the Court and will not take possession of the Jewelry unless and until fees are properly approved and express authorization is granted by the Bankruptcy Court.

FURTHER, AFFIANT SAITH NOT.

Dated this the 14th day of May, 2025.

By: Thomas Polling

SWORN TO AND SUBSCRIBED BEFORE ME, this the 22

he 22 day of

NOTARY PUBLIC

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI
5	SOUTHERN DISTRICT OF MISSISSIPPI
6	IN RE: CASE NO: 25-01234
7	BECKHAM JEWELRY, LLC  DECLARATION OF MAILING  CERTIFICATE OF SERVICE
8	Chapter: 11
9	
10	
11	On 5/23/2025, I did cause a copy of the following documents, described below,
12	Amended App to Employ Rollins Law Firm
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18	to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
19	sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice. com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.
21	
22	Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
23	served electronically with the documents described herein per the ECF/PACER system.  DATED: 5/23/2025
24	/s/ Thomas C. Rollins, Jr. Thomas C. Rollins, Jr. 103469
25	The Rollins Law Firm
26	PO Box 13767  Jackson, MS 39236
27	601 500 5533 jennifer@therollinsfirm.com
28	

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4	UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF MISSISSIPPI
5	IN RE:   CASE NO: 25-01234
6	BECKHAM JEWELRY, LLC CERTIFICATE OF SERVICE
7	DECLARATION OF MAILING  Chapter: 11
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11	On 5/23/2025, a copy of the following documents, described below,
12	Amended App to Employ Rollins Law Firm
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19	were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.
20	The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above
21	referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.
22   23	DATED: 5/23/2025
24	
25	While hall
26	Miles Wood BK Attorney Services, LLC
27	d/b/a certificateofservice.com, for Thomas C. Rollins, Jr.
28	The Rollins Law Firm PO Box 13767 Jackson, MS 39236

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USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

LABEL MATRIX FOR LOCAL NOTICING NCRS ADDRESS DOWNLOAD CASE 25-01234 SOUTHERN DISTRICT OF MISSISSIPPI FRI MAY 23 8-4-24 PST 2025

DEBTOR

BECKHAM JEWELRY LLC 120 DISTRICT BLVD STE D110 JACKSON MS 39211-6304 EXCLUDE

(U) TOLDC RETAIL T LLC

US BANKRUPTCY COURT THAD COCHRAN US COURTHOUSE 501 E COURT STREET JACKSON MS 39201-5036

BARNES BAILEY JANO 5 RIVERBEND PLACE STE A

FLOWOOD MS 39232-7618

BRIAN BECKHAM 120 DISTRICT BLVD STE D110

JACKSON MS 39211-6304

DAZZLE IMPORTS 5555 GLENDRIDGE CONNEC

STE 200 ATLANTA GA 30342-4815

DYNASTY CASTING DYNASTY CASTING 644 SHREWSBERRY COMMON SHREWSBURY PA 17361-1617 ELDAR INC 3068 N 2700 E FORREST IL 61741

GARY CARRIERE 125 DEATON RD

OWENS CROSS ROADS AL 35763-9553

HAKIMI DIAMOND CORP 15 W 47TH ST

NEW YORK NY 10036-3305

HEERA MOTI INC 15 W 47TH ST STE 808

NEW YORK NY 10036-3327

HINDS CO TAX COLLECTOR PO BOX 1727

JACKSON MS 39215-1727

HINDS COUNTY TAX COLLECTOR 316 SOUTH PRESIDENT ST JACKSON MS 39201-4801

(P) INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346

PHILADELPHIA PA 19101-7346

KELLY WATERS PO BOX 240924

BOSTON MA 02124-0016

KERRY WHITT CO 125 DEATON RD

OWENS CROSS ROADS AL 35763-9553

LAMHA 20 W 47ST ST STE 807

NEW YORK NY 10036-4298

(P) MISSISSIPPI STATE TAX COMMISSION MCLEOD RIGEL PA

P O BOX 22808 JACKSON MS 39225-2808

MCLEOD RIGEL PA 10 PROFESSIONAL PKWY HATTIESBURG MS 39402-2636

580 5TH AVE STE 2508

NTVODA

NEW YORK NY 10036-4771

OVERNIGHT MOUNTINGS I 1400 PLAZA AVE

NEW HYDE PARK NY 11040-4921

ROBERT B IRELAND III ESQ WATKINS EAGER PLLC ATTY FOR TDLDC RETAIL I LLC PO BOX 650

S KASHI 175 ROAD STE 204 GREAT NECK NY 11021

STULLER

PO BOX 87777 LAFAYETTE LA 70598-7777 TDLDC RETAIL I LLC 300 CONCOURSE BLVD STE 105

JACKSON MS 39205-0650

RIDGELAND MS 39157-2091

TR JEWELRY CONCEPTS 2707 MT RUSHMORE RD RAPID CITY SD 57701-5324

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USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

US ATTORNEY SD MISSISSIPPI CO INTERNAL REVENUE SERVICE 501 E COURT STREET STE 4430 JACKSON MS 39201-5025 US ATTORNEY SD MISSISSIPPI CO US SECURITIES AND EXCHANGE COMMISS 501 E COURT STREET STE 4430 JACKSON MS 39201-5025

US SECURITIES AND EXCHANGE COMMISSION OFFICE OF REORGANIZATION 950 EAST PACES FERRY ROAD SUITE 900 ATLANTA GA 30326-1382

#### EXCLUDE

UNITED STATES TRUSTEE
501 EAST COURT STREET
SUITE 6 430

WLBT 715 S JEFFERSON ST JACKSON MS 39201-5622

#### EXCLUDE

CRAIG M GENO
LAW OFFICES OF CRAIG M GENO PLLC
601 RENAISSANCE WAY
SUITE A
RIDGELAND MS 30157-6038

#### EVELUE

JENNIFER A CURRY CALVILLO THE ROLLINS LAW FIRM 702 W PINE ST HATTIESBURG MS 39401 3836 EXCLUDE

THE ROLLING LAW FIRM PLLC PO BOX 13767 JACKSON MS 39236 3767